

**DELBELLO DONNELLAN WEINSTEIN
WISE & WIEDERKEHR, LLP**

COUNSELLORS AT LAW

THE GATEWAY BUILDING
ONE NORTH LEXINGTON AVENUE
WHITE PLAINS, NEW YORK 10601

(914) 681-0200
FACSIMILE (914) 684-0288

1111 SUMMIT STREET
STAMFORD, CT 06905
(203) 298-0000

Catherine S. Campbell
Partner
csc@ddw-law.com

September 7, 2022

Via CM/ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: H&H Metals Corp. vs. Panjwani & Panjwani; Misc. Case 20-mc-390 (AT)

Dear Judge Torres:

We are attorneys for petitioner/judgment creditor, H&H Metals Corp. ("Petitioner"), in the above referenced action and submit this letter to request (i) an extension of the deposition date deadline in connection with your Honor's August 20, 2022 order ("August 2022 Order"; ECF Doc. No. 30), and (ii) additional document production in connection with Petitioner's Subpoena to Gulshan Panjwani dated March 5, 2020 ("Subpoena"; ECF Doc. No. 5-3, and attached hereto as Ex. C).

Request for Extension to Deposition Date

The August 2022 Order directed the Respondents, Gulshan Panjwani and Mona Panjwani, to each appear for a deposition by October 14, 2022. As counsel for Petitioner, I will be out of the country from September 26 through October 13, 2022 and unable to take the depositions of the Respondents until after Oct. 14. Petitioner requests an extension of the deposition deadline to November 4, in order to provide time to set up the deposition date with the Respondents' new counsel and to prepare for the deposition after Oct. 14.

I have not sought the Respondents' agreement to this request, as they are not currently represented by counsel but indicate they will not proceed *pro se* in this action. It seems that the deadline for the Respondents' status letter to the Court regarding compliance with the May 2022 Order should also be extended for 2 weeks after Nov. 4 to Nov. 18, 2022. However, Petitioner requests that the other dates in the August 2022 Order remain as set by the order.

Request for Additional Document Production

Petitioner has found that Gulshan Panjwani closed his personal bank accounts at HSBC and Santander Bank after producing the bank records for these accounts to Petitioner in May

HON. ANALISA TORRES
SEPT. 7, 2022
PAGE TWO

2022 (Bank responses attached hereto as Exs. A & B). No other personal bank account information was provided by Gulshan Panjwani. In early July 2022, in anticipation of the upcoming deposition on July 31, Petitioner made a request to the Respondents' former attorney Steven Lester, Esq. for Mr. Panjwani's current personal bank account records. Mr. Lester acknowledged the request, but then shortly thereafter filed his motion to be relieved as counsel. Thus, it is not known if Petitioner's request was forwarded to Mr. Panjwani. Regardless, Mr. Panjwani has not produced his current personal bank account records.

To avoid a repeat of the prior deposition in which Mr. Panjwani appeared without producing documents, Petitioner requests that the Court order Mr. Panjwani to produce by the deadline set in the August 2022 Order, all records responsive to Nos. 1-3 of the Attachment to the Subpoena for the period May 1, 2022 through the date of production, *e.g.*, Oct. 14, 2022.

Both requests are the first time Petitioner has submitted these requests to the Court. Petitioner respectfully requests that the Court grant an extension of the Respondents' depositions to Nov. 4, 2022, and direct Gulshan Panjwani to produce by Oct. 14, 2022, all responsive records to Subpoena document requests Nos. 1-3 for bank account records dated between May 1, 2022 and the date of production.

Respectfully submitted,

/Catherine S. Campbell/

Catherine S. Campbell

Encl.

cc: Torres_NYSDChambers@nysd.uscourts.gov

Gulshan.panjwani@gmail.com

Respondents, Gulshan Panjwani and Mona Panjwani

GRANTED. By **November 4, 2022**, Respondents shall appear for a deposition. By **November 18, 2022**, Respondents shall file a letter updating the Court on the status of their compliance with the Court's May 24, 2022 order, ECF No. 21.

SO ORDERED.

Dated: September 8, 2022
New York, New York



ANALISA TORRES
United States District Judge